

FILED 17 APR '14 17:05 USDC-ORP

**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**Case No. 3:14-cr-00033-MO**

**v.**

**SUPERSEDING INDICTMENT**

**MICHAEL DEONSHAE WILLIS, JR.**  
**(a/k/a "Mackin Mike"),**

**18 U.S.C. §§ 1591, 1594, 1952(a)(3), 2421,**  
**18 U.S.C. §§ 981(a)(1)(C), 2428,**  
**28 U.S.C. § 2461(c)**

**Defendant.**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**Sex Trafficking by Force and Coercion**

Beginning in or about July 2012 and continuing until on or about September 24, 2012, in the District of Oregon and elsewhere, **MICHAEL DEONSHAE WILLIS, JR.**, defendant herein, did knowingly and attempt to, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, "O.T.," knowing, and in reckless disregard of the fact, that means of force, threats of force and coercion, and any combination of such means, would be used to cause "O.T." to engage in a commercial sex act; all in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and 1594(a).

**COUNT 2**  
**Mann Act**

On or about July 30, 2012, in the District of Oregon and elsewhere, **MICHAEL DEONSHAE WILLIS, JR.**, defendant herein, did knowingly transport, and cause to be transported, "S.B." in interstate commerce from the State of Oregon to the State of Alaska, while having the intent that "S.B." engage in prostitution; all in violation of Title 18, United States Code, Section 2421.

**COUNT 3**  
**Mann Act**

On or about September 17, 2012, in the District of Oregon and elsewhere, **MICHAEL DEONSHAE WILLIS, JR.**, defendant herein, did knowingly transport, and cause to be transported, "O.T." in interstate commerce from the State of Oregon to the State of Hawaii, while having the intent that "O.T." engage in prostitution; all in violation of Title 18, United States Code, Section 2421.

**COUNT 4**  
**Travel Act**

On or about June 21, 2012, in the District of Oregon and elsewhere, **MICHAEL DEONSHAE WILLIS, JR.**, defendant herein, traveled in interstate commerce, from the State of Oregon to the State of Hawaii, with the intent to promote, manage, establish, carry on, and to facilitate the promotion, management, and carrying on of, an unlawful activity, specifically, a business enterprise involving prostitution offenses in violation of the laws of the State of Hawaii, and after traveling from Oregon to Hawaii, did facilitate the promotion, management, and carrying on of said unlawful activity; all in violation of Title 18, United States Code, Section 1952(a)(3).

**COUNT 5**  
**Travel Act**

On or about August 12, 2012, in the District of Oregon and elsewhere, **MICHAEL DEONSHAE WILLIS, JR.**, defendant herein, traveled in interstate commerce, from the State of Oregon to the State of Alaska, with the intent to promote, manage, establish, carry on, and to facilitate the promotion, management, and carrying on of, an unlawful activity, specifically, a business enterprise involving prostitution offenses in violation of the laws of the State of Alaska, and after traveling from Oregon to Alaska, did facilitate the promotion, management, and carrying on of said unlawful activity; all in violation of Title 18, United States Code, Section 1952(a)(3).

**CRIMINAL FORFEITURE ALLEGATIONS**

Upon conviction of the offense set forth in Count 1 herein, **MICHAEL DEONSHAE WILLIS, JR.**, defendant herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 1594, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation.

Upon conviction of one or more of the offenses set forth in Counts 2 and 3 herein, **MICHAEL DEONSHAE WILLIS, JR.**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 2428, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations.

Upon conviction of one or more of the offenses set forth in Counts 4 and 5 herein, **MICHAEL DEONSHAE WILLIS, JR.**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said offenses.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

DATED this 16<sup>TH</sup> day of April 2014.

A TRUE BILL.

  
OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL  
United States Attorney

  
STACIE F. BECKERMAN, OSB #062397  
Assistant United States Attorney